

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES OF AMERICA

vs.

ANA MARIA GARCIA-GARCIA
ANDREW GARCIA

CRIMINAL NO.:

4:16-150
18 U.S.C. § 2
18 U.S.C. § 924(c)(1)(A)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846

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FLORENCE, S.C.

SEALED INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

That beginning at a time unknown to the Grand Jury, but beginning at least in 2010, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina, the Defendants,

ANA

MARIA GARCIA-GARCIA and ANDREW GARCIA, knowingly and intentionally did combine, conspire, agree and have tacit understanding with each other and with others, both known and unknown to the grand jury, to possess with intent to distribute and to distribute heroin, a Schedule I controlled substance;

- a. With respect to _____ the amount involved in the conspiracy attributable to his as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a kilogram or more of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- b. With respect to _____ the amount involved in the conspiracy attributable to his as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a kilogram or more of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- c. With respect to _____ the amount involved in the conspiracy attributable to his as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a kilogram or more of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- d. With respect to _____ the amount involved in the conspiracy attributable to his as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a kilogram or more of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- e. With respect to **ANA MARIA GARCIA-GARCIA**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is a kilogram or

more of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

- f. With respect to **ANDREW GARCIA**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is a kilogram or more of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

All in violation of Title 21, United States Code, Section 846.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That on or about August 26, 2013, in the District of South Carolina, the defendant,
knowingly, intentionally and unlawfully did possess with intent to
distribute and did distribute a quantity of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That on or about August 29, 2013, in the District of South Carolina, the defendant,
knowingly, intentionally and unlawfully did possess with intent to
distribute and did distribute a quantity of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

THE GRAND JURY CHARGES:

That on or about September 12, 2013, in the District of South Carolina, the defendant,
knowingly, intentionally and unlawfully
did possess with intent to distribute and did distribute a quantity of heroin, a Schedule I
controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT 8

THE GRAND JURY FURTHER CHARGES:

That on or about August 20, 2014, in the District of South Carolina, the defendant, **ANDREW GARCIA**, knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 9

THE GRAND JURY FURTHER CHARGES:

That on or about August 25, 2014, in the District of South Carolina, the defendant, **ANDREW GARCIA**, knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 10

THE GRAND JURY FURTHER CHARGES:

That on or about September 12, 2014, in the District of South Carolina, the defendant, **ANDREW GARCIA**, knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 11

THE GRAND JURY FURTHER CHARGES:

That on or about September 24, 2014, in the District of South Carolina, the defendant, **ANDREW GARCIA**, knowingly, intentionally and unlawfully did possess with intent to distribute 100 grams of more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 12

THE GRAND JURY FURTHER CHARGES:

That on or about September 24, 2014, in the District of South Carolina, the defendant, **ANDREW GARCIA**, knowingly used and carried firearms during and in relation to, and possessed firearms in furtherance of, a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

A TRUE BILL


FOREPERSON


WILLIAM N. NETTLES (CDT)
UNITED STATES ATTORNEY